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BEFORE THE POSTAL REGULATORY COMMISSION WASHINGTON, D.C. 20268-0001

In the matter of:

Venice Main Post Office Venice, California 90291 (Mark Ryavec and Venice Stakeholders Association, Petitioners)

Docket No. A2012-17

MOTION REQUESTING AN EXTENSION OF TIME TO FILE PETITIONERS' INITIAL BRIEF PENDING PRODUCTION OF THE ADMINISTRATIVE RECORD

Pursuant to Rule 16 of the Postal Regulatory Commission's Rules of Practice and Procedure, petitioners Venice Stakeholders Association and Mark Ryavec (collectively "Petitioners"), by counsel, respectfully move for an extension of one week in which to file their initial brief from the date of the United States Postal Service's (1) proposed production of the administrative record on Friday, December 2, 2011, or (2) ordered production, if the Commission grants the Postal Service's motion for extension of time beyond Friday, December 2, 2011. As Petitioners explained in their previous motions for extension of time and to compel production of the administrative

record, the record is critical to the merits of this appeal and Petitioners cannot complete

their initial brief without a reasonable amount of time to consider and incorporate its

contents.

In Order No. 967, issued November 16, 2011, the Commission granted

Petitioners' motions and directed the Postal Service to file the administrative record by

November 28, 2011. To date, the Postal Service has not produced the administrative

record and has requested an extension through Friday, December 2, 2011. Petitioners

did not oppose this motion, but requested that the Commission only grant the motion if a

reciprocal extension could be made on the filing deadline for Petitioners' initial brief. At

this point, however, it appears the Postal Service will not produce the record, with or

without an extension from the Commission, until December 2. Petitioners' initial brief is

currently due on Monday, December 5, 2011, the next business day following the Postal

Service's proposed production date. This deadline, in light of the Postal Service's

delayed production, will not afford Petitioners sufficient time to consider the record and

supplement any deficiencies before filing their brief.

WHEREFORE, Petitioners respectfully request a one-week extension until

December 12, 2011 to file their initial brief.

DATED: December 1, 2011

JULIE KIMBALL

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VENICE STAKEHOLDERS ASSOCIATION

and MARK RYAVEC

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